

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a California
Corporation,

Plaintiff and
Counterclaim-Defendant,

v.

INTERNET SECURITY SYSTEMS, INC.,
a Delaware corporation, INTERNET
SECURITY SYSTEMS, INC., a Georgia
corporation, and SYMANTEC
CORPORATION, a Delaware corporation,

Defendants and
Counterclaim-Plaintiffs.

C. A. No. 04-1199 (SLR)

PUBLIC VERSION

**DECLARATION OF KYLE WAGNER COMPTON IN SUPPORT OF SRI
INTERNATIONAL, INC.'S REPLY CLAIM CONSTRUCTION BRIEF**

I, Kyle Wagner Compton, declare as follows:

I am an Associate with Fish & Richardson P.C., counsel for Plaintiff SRI
International, Inc. ("SRI"). I make the following statements based on personal
knowledge.

1. Attached as Exhibit A is a true and correct copy of U.S. Patent No. 6,321,338.
2. Attached as Exhibit B is a true and correct copy of the publication by Steven R. Snapp, et al., *Intrusion Detection Systems (IDS): A Survey of Existing Systems and A Proposed Distributed IDS Architecture*, February 1991, bearing the production numbers SYM_P_0069280-0069297.
3. Attached as Exhibit C is a true and correct copy of the publication by Steven R. Snapp, et al., *DIDS (Distributed Intrusion Detection System) – Motivation, Architecture, and An Early Prototype*, October 1991, bearing the production numbers SYM_P_0077175-0077185.
4. Attached as Exhibit D is a true and correct copy of the publication by L. Todd Heberlein, et al., *A Network Security Monitor*, Proceedings of 1990 Symposium on

Research in Security and Privacy, May 1990, bearing the production numbers SYM_P_0068974-0068986.

5. Attached as Exhibit E is a true and correct copy of the publication by L.T. Heberlein, et al. *Internet Security Monitor: An Intrusion-Detection System for Large-Scale Networks*, Proceedings of the 15th National Computer Security Conference, October 13-16, 1992, bearing the production numbers SYM_P_0069244-0069254.

6. Attached as Exhibit F is a true and correct copy of the publication by Harold S. Javitz and A. Valdes, *The NIDES Statistical Component Description and Justification*, March 7, 1994, bearing the production numbers SYM_P_0078943-0078994.

7. Attached as Exhibit G is a true and correct copy of the publication by Y. Frank Jou, and S.F. Wu, *Architecture Design of a Scalable Intrusion Detection System for the Emerging Network Infrastructure*, DARPA Technical Report, April 1997, bearing the bates numbers ISS27334-27374.


8. Attached as Exhibit H is a true and correct copy of the Rebuttal Expert Report of Stephen E. Smaha, dated May 16, 2006.

9. Attached as Exhibit I is a true and correct copy of the Expert Report of Stuart Staniford, dated April 21, 2006.

10. Attached as Exhibit J is a true and correct copy of excerpts from the rough deposition transcript of Stuart G. Staniford, Ph.D taken June 6, 2006.

11. Attached as Exhibit K is a true and correct copy of excerpts for the deposition transcript of Phillip Porras Volume III taken May 10, 2006.

I declare under penalty of perjury under that the foregoing is true and correct.
Executed this 30th day of June 2006, in Wilmington, Delaware.



Kyle Wagner Compton

CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2006, I electronically filed the **REDACTED –
DECLARATION OF KYLE WAGNER COMPTON IN SUPPORT OF SRI
INTERNATIONAL, INC.’S REPLY CLAIM CONSTRUCTION BRIEF** with the
Clerk of Court the attached document using CM/ECF which will send electronic
notification of such filing(s) to the following Delaware counsel.

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/s/ John F. Horvath
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